

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SANDRA GUZMAN,

Plaintiff,

v.

NEWS CORPORATION, NYP HOLDINGS, INC.,
d/b/a NEW YORK POST, and COL ALLAN, in his
official and individual capacities,

Defendants.
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Civil Action No. 09 CV 9323 (BSJ)(RLE)

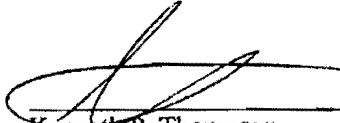
PROPOSED DISCOVERY PLAN

Pursuant to this Court's request, the Parties hereby submit this Proposed Discovery Plan
to the Court for its consideration:

- (1) The Parties will complete fact discovery, including all depositions, by **December 30, 2011**. Plaintiff will be available for deposition between **October 1, 2011 and October 15, 2011**. Unless the Parties otherwise agree or the Court So Orders, depositions will not be conducted unless all Parties have fully responded to all current outstanding requests for documents and interrogatories. Also, unless the Parties otherwise agree or the Court So Orders, non-party depositions will be conducted after party depositions if possible.
- (2) A party moving for summary judgment will serve their moving papers by **January 31, 2012**. Opposition papers, if any, will be served by **February 28, 2012**. Reply papers, if any, will be served by **March 15, 2012**.
- (3) If necessary, a Joint Pretrial Order will be submitted within thirty (30) days after a decision has been rendered on all dispositive motions.
- (4) The Parties will complete expert discovery within ninety (90) days after a decision has been rendered on all dispositive motions. The Parties will serve their expert reports within thirty (30) days after a decision has been rendered on all dispositive motions. The Parties will serve their expert rebuttal reports thirty (30) days later.

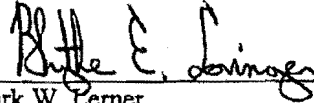
Dated: July 22, 2011

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SO ORDERED:


JUDGE RONALD E. ELLIS